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Federal Communications Commission
Office of the Secretary

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

October 23, 2011

**Re: LightSquared Subsidiary LLC, Application for Modification of
Authority for Ancillary Terrestrial Component; IB Docket No. 11-109; IBFS
File No. SAT-MOD-20101118-00239; Written Ex Parte Communication**

Dear Ms. Dortch:

We write to express our deep concern about the above referenced proceeding. We urge the FCC to take no action that could jeopardize, in any way, the utility of GPS systems, which are a critical part of our business.

The members of the Professional Land Surveyors of Oregon, comprised of over 750 public and private land surveyors, depend upon GPS technology to effectively do our jobs. Our high-precision GPS receivers are the backbone of land surveying and without it we would need to revert to out-moded line-of-sight surveying methods. This would not produce results we would find acceptable.

We understand that a company called LightSquared, which is licensed to operate a mobile satellite system ("MSS") would like to convert the spectrum for which it is licensed by the FCC to build a ubiquitous wireless broadband terrestrial network. We also understand that the spectrum for which LightSquared is authorized is nearby to the spectrum that GPS devices receive. Because both are satellite-based systems today, they can apparently successfully co-exist in nearby spectrum bands. However, LightSquared's proposal would result in incompatible uses being located in nearby spectrum bands. Because LightSquared would have the more

powerful system, it will apparently cause destructive interference to GPS. While we certainly support the FCC making additional spectrum capacity available for wireless broadband, it should not do so at the cost of destroying GPS, which plays a critical role in our business and the United States economy in general.

We understand that testing has already taken place which shows the interference that LightSquared will cause to GPS and that, as a result, LightSquared has modified its proposed use of the spectrum it holds. As the FCC has apparently recognized, more testing of this new proposal must take place, and only when testing shows that there will be no interference, should LightSquared be able to proceed.

Apparently, LightSquared believes that it can produce test results showing no harmful interference under its new plan by introducing filters that would be used on high precision GPS equipment, like that used by land surveyors. Saying that the interference is solved through the use of filters is not an answer, or at least not a complete answer. Surveyors who purchase sophisticated and expensive position-finding equipment should not be expected to buy a filter so that their GPS devices can continue to work – particularly if they need to do so to accommodate a third party's profit-making venture. It is fundamentally inequitable if surveyors are sacrificed to LightSquared's businesses. We understand that there has been no real-world testing of these filters, so there is no evidence that they can be successfully integrated into existing devices and made to work, particularly in the challenging environments in which surveyors operate. Finally, in the unlikely event that these filters work, LightSquared must be required to pay for all parts and labor necessary to install the filters and make them operational. LightSquared cannot be permitted to proceed until every device is retrofitted at LightSquared's expense.

We appreciate the FCC's careful consideration of this matter and its commitment not to destroy the important functions that GPS technology plays in the surveying industry.

Very truly yours,

The Board of Directors of the Professional Land Surveyors of Oregon
For a complete list of names, see PLSO.org.